

STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

October 13, 2008

Gerardo Rios, Chief (A-5-1)
New Source Section
Air & Toxics Division
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: Proposed Air Quality Operating Permit #AP3441-2437 for Valley Joist

Dear Mr. Rios:

Enclosed please find a copy of the draft permit and technical review of the application for Valley Joist located in Fernley, Nevada for your information and review.

On September 5, 2008, copies of the draft permit, technical review of the permit application, emission calculation sheets, permit application submittals and Notice of Proposed Action (public notice) were sent to you for review and comments. The public notice was also sent to all interested parties and also published in the Reno Gazette-Journal with general circulation in Fernley, Reno, and Sparks, Nevada. The public comment period ended on October 10, 2008. There were no comments received by the Nevada Bureau of Air Pollution Control for the Valley Joist's proposed Air Quality Operating Permit #AP3441-2437.

Pursuant to Nevada Administrative Code 445B.340, this information is being provided to you to initiate EPA's 45-day review period. If you have any questions, please contact me at (775) 687-9336 or Matthew DeBurle at (775) 687-9391.

Sincerely,

Matthew A. DeBurle, P.E.
Supervisor, Permitting Branch
Bureau of Air Pollution Control

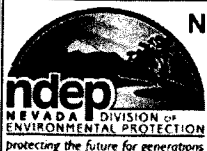
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CERTIFIED MAIL 7007 2560 0000 5997 8971

Enclosures: Proposed Permit and Technical Review

cc w/enclosures: Kim James
Vice President & General Manager
Valley Joist, Inc
255 Logan Road
Fernley, NV 89408



**BUREAU OF AIR POLLUTION CONTROL****Facility ID No. A0012****Permit No. AP3441-2437****Director's Review and Preliminary Determination of
Permit Issuance****Valley Joist, Inc.****September 3, 2008**

Valley Joist, Inc. has submitted a Class I application to the Nevada Division of Environmental Protection, Bureau of Air Pollution Control (NDEP-BAPC) requesting a new Class I (Title V) Air Quality Operating Permit. The facility is currently operating under a Class I permit #AP3441-0815.01 issued November 26, 2003. This new permit is for the emission units regulated by the NDEP-BAPC only.

The new permit is for operating two surface coating dip tanks, one bridging dip tank, fabrication operations, paint and solvent storage tanks, and parts washing. Issuance of a new Class I permit (No. **AP3441-2437**) will replace Valley Joist's permit no. AP3441-0815.01 and allow Valley Joist, Inc. to continue operation of their existing processes.

The application materials related to the new Class I air operating permit were originally received by NDEP-BAPC on April 18, 2008. The permit application was deemed administratively complete by default on June 17, 2008. The NDEP-BAPC case log number for this application is 08AP0286.

The facility is located at 255 Logan Road, Logan Industrial Park, Fernley, NV 89408, Lyon County, Nevada. The facility operations are located approximately at UTM 306.04 km East by 4,386.09 km North, Zone 11 (Section 11, Township 20 North, Range 24 East in Hydrographic Area 76. The Standard Industrial Classification (SIC) number for the facility is 3441 (Fabricated Structural Metal).

The existing facility permit defines the Valley Joist's facility as an existing major stationary source because emissions of several criteria pollutants are above the 100 tons/year threshold. However, the facility is classified as a minor source for PSD purposes. Any future modification in excess of the PSD thresholds will require PSD review. Valley Joist, Inc. is not an affected facility by NSPS, and NESHAP does not apply since the coatings used by Valley Joist, Inc. do not contain HAPs. And lastly, MACT is not applicable to this facility.

<i>Facility-Wide Proposed Annual Emissions</i>		
Pollutant(s)		tons/yr
PM	Particulate Matter	9.49
PM₁₀	Particulate matter <10 microns in diameter	9.49
NO_x	Nitrogen Oxides	5.15
CO	Carbon monoxide	1.54
SO₂	Sulfur Dioxide	0.22
VOCs	Volatile Organic Compounds	249.0
HAPs	Hazardous Air Pollutants	5.62

The Ambient Air Quality Modeling demonstrates that the emissions from the proposed processes will not cause or contribute to a violation of any applicable federal or state ambient air quality standard. Adverse air quality impacts are not expected. Therefore, NDEP-BAPC has made a preliminary determination to issue this Class I Operating Permit (New) #AP3441-2437 with appropriate conditions. The proposed source must comply with all State and Federal air quality requirements and all conditions established within the proposed Operating Permit (New).

CLASS I APPLICATION REVIEW

AND DETERMINATION OF PRELIMINARY COMPLIANCE

FOR:

Valley Joist, Inc.

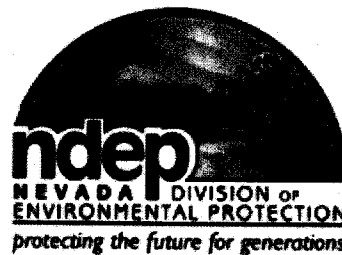
Fernley, Nevada

Class I Application

FIN #: A0012

Log Number 08AP0286

AP3441-2437



BY

**STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY**

Ingrid Newton
SEII

August 15, 2008

1.0 INTRODUCTION

Valley Joist, Inc. submitted a renewal application to the Nevada Division of Environmental Protection (NDEP) Bureau of Air Pollution Control (BAPC) on April 18, 2008. February 20, 2008 marked the deadline for submittal of their renewal application; therefore, a new Class I Air Quality Operating Permit (AP3441-2437) (log # 08AP0286) is proposed for issuance rather than renewal of AP3411-0815.01. The application was deemed administratively complete on June 17, 2008 by default. The facility's current permit expires on November 26, 2008.

The facility is currently operating under a Class I permit #AP3441-0815.01 issued November 26, 2003 with volatile organic compound (VOC) emissions capped at 249.0 tpy which is below the 250 tpy Prevention of Significant Deterioration (PSD) threshold. The total HAP emissions are 2.81 tons per year, with the largest individual HAP at 2.78 tons per year, which is below the 25.0 tpy total and 10.0 tpy individual HAP major source threshold. The only permitted HAP emissions are from welding (fabrication) operations.

The facility is located at the Logan Industrial Park in Fernley, Nevada. The plant is located in the Northwest Nevada Intrastate Air Quality Control Region as described in 40 CFR 81.115 and Hydrographic Basin 76, which is a PSD triggered basin for SO₂ as of 10/26/82. The Standard Industrial Classification (SIC) number for the process is 3441.

Total facility-wide particulate matter (PM) and PM₁₀ (particulate matter less than 10 microns in diameter) emissions are calculated at 9.50 tpy. Therefore, the facility is a Class I (or Title V) source based on a requested cap of VOC emissions of 249 tpy, which exceeds 100 tpy. The facility-wide emission estimates indicate that gaseous emissions from the trivial/insignificant activities of diesel fuel combustion in equipment, propane combustion in space heaters and particulate emissions in wood cutting will be below the Class I applicability thresholds of 100 tpy for NO_x (5.15 tpy), SO₂ (0.22 tpy), and CO (1.54 tpy). Please refer to Attachment 2 (Emissions Inventory) for the emissions calculations. Valley Joist, Inc. provided the information on facility-wide emissions.

2.0 DESCRIPTION OF PROCESS

The process manufactures open web steel joists. Incoming steel is conveyed to the fabricating operations, which include cutting, bending, assembling, punching and welding.

The fabricated joist is then surface coated in a gray primer dip tank. The coated joist is then allowed to air dry. The facility requested that facility-wide VOC emissions from the three dip tanks (long span dip tank, short span dip tank, and bridging tank) and parts washing from paint and solvent usage be limited with a Federally Enforceable Cap of a combined total maximum of 249.0 tpy to avoid PSD permitting. VOC emissions from the trivial/insignificant activities are not permitted and will not exceed 0.37 tpy, therefore, based on the total calculated potential to emit of 249.37 tpy for permitted and insignificant activities, the facility will be below the PSD threshold of 250 tpy.

The parts cleaning operation is considered insignificant; however, it will be permitted. The parts cleaning operation consumes approximately 1.438 gallons/year of mineral spirits. The mineral spirits MSDS sheet shows that the mineral spirits is a non-HAP, VOC potential emitting material. Annual VOC emissions from the parts washing are 0.0046 tpy. This is below the insignificant activity criteria of 4,000 lb/yr emission rate listed in 445B.288.4.a.2, however, this operation is integral to the overall operations and is one of several processes that use mineral spirits, therefore, permit conditions will be established for the parts washing, including application of the facility-wide VOC emissions cap. The solvent and coating materials will not contain any HAPs and there is no need to account for or develop a HAP emissions cap. The emissions are uncontrolled.

The welding operation has a limit of 400 pounds/hour due to maximum anticipated production. Particulate matter and HAP emissions were calculated based on 8,760 hrs/yr with particulate matter emissions calculated at 9.11 tpy. HAP emissions from welding operations are the only source of HAPs from permitted activities and have a potential of 5.624 tpy total HAPs. The insignificant fuel burning activities will not contribute significantly to this total. In order to keep track of HAPs emissions, this activity will be permitted for hourly operation monitoring; however, this activity is not likely to contribute to VOC emissions.

The 6,000-gallon capacity paint storage tank and 2,000-gallon capacity solvent storage tanks have capacities below the 40,000-gallon capacity specified in NAC 445B.288.2.d and, therefore, would not typically be permitted. Valley Joist, Inc. has requested a facility-wide Federally Enforceable Cap for VOCs, which is very close to the PSD trigger of 250 tpy. It is essential that potential emissions from the storage tanks be quantified in reference to the cap. The storage tanks are permitted because monitoring and recordkeeping requirements are needed to quantify their contributions to the cap. Since the dip tanks and parts washer use paint/coatings and solvents that are contained in the storage tanks or other smaller storage containers, VOC emissions are quantified based on the VOC content of paint/coating material and solvent or any other VOC containing material contained in these storage tanks or utilized in the truss manufacturing or coating/cleaning processes. VOC emissions from the diesel tank are negligible in relation to the potential from the solvent/coating tanks, and have been taken into account in developing the VOC cap. The paint/coating, solvent and diesel storage tanks are not subject to the New Source Performance Standards 40 CFR Part 60 Subpart Kb because they do not meet the requirements of 60.110b. The tanks are less than 20,000 gallons each in capacity.

Emissions from diesel fuel combustion in equipment (mobile sources) used to handle finished products are currently considered trivial activities pursuant to the Trivial Activities List (6/96). Items on the Trivial Activities List are not required for description in the application or included in the inventory. Emissions from natural gas fuel usage in the individual space heaters (applicant provides estimated total of 5 MMBtu for all space heaters and less than 4 MMBtu individually) are currently considered insignificant activities pursuant to NAC 445B.288.2.e.1. The emissions inventory utilizes 8,760 hrs/yr for the space heater calculation to provide an extremely conservative estimate of emissions. This calculation method allows the emissions from the diesel storage tank, space heaters and support equipment (mobile sources) to be considered in the proposed facility-wide VOC cap total of 249.0 tpy in so much as their VOC emission contribution will not cause the applicant to exceed 250.0 tpy VOC.

Valley Joist, Inc. uses a portable electric circular saw to cut wood which is attached to some joists. This activity is conducted on an "as needed" basis to trim lumber to the length of the joist. This activity is not expected to generate emissions near the insignificant emission threshold of 4,000 lb/year and will be considered insignificant for permitting purposes.

Valley Joist, Inc. will maintain records of the VOC content of each paint/coating material and solvent or any other VOC containing material contained in the storage tanks or utilized in the truss manufacturing or

coating/cleaning processes to verify VOC emissions. The facility will maintain records on the initial gallons of paint/coating material and solvent contained in the paint and solvent storage tanks or otherwise utilized in the truss manufacturing or coating/cleaning processes. The facility will record the gallons used and VOC content of each paint/coating material and solvent in the paint and solvent storage tanks or otherwise utilized in the truss manufacturing or coating/cleaning processes on a monthly frequency. The total VOC emissions will be compared against the facility-wide VOC cap on a monthly and annual 12-month rolling basis. This provides verification that the VOC emissions remain within the permitted emission limitations.

Valley Joist, Inc will be prohibited from using any HAP containing paint/coating material and solvent in the truss coating/cleaning process. The applicant is already using non-HAP containing paint/coating material and solvent in the process; however, a HAP cap was requested by the applicant. The only permitted process emitting HAPs will be the welding process.

3.0 APPLICABLE REQUIREMENTS

Applicable requirements are those regulatory requirements that apply to a stationary source or to emissions units contained within the stationary source. In Nevada's program, the regulations governing the emissions of air pollutants from which the applicable requirements had originated are derived from four categories of regulations. These four categories consist of the requirements contained in the Nevada Revised Statutes (NRS), the Nevada Administrative Code (NAC), the Applicable State Implementation Plan (ASIP), and the Code of Federal Regulations (CFR), contained in various Parts within Title 40.

3.1 GENERALLY APPLICABLE REQUIREMENTS

Of the four categories of regulations governing emissions of air pollutants, there are many generally applicable requirements that apply to stationary sources and emission units located at a stationary source. A comprehensive summary of all the generally applicable permit requirements is contained in Sections I through IV of the proposed operating permit provided in Attachment 3, Proposed Operating Permit.

3.2 SPECIFIC APPLICABLE REQUIREMENTS

The remainder of this section of the review will focus on specific applicable requirements associated with each emission unit at the Valley Joist, Inc. site. A list of the emission units, as identified in the application and a summary of the specific applicable requirements, is contained in Table 3.2.1.

TABLE 3.2.1 - List of Emission Units and Associated Specific Applicable Standards

EU #	Unit Description	Applicable Standards					
		NAC (445B)	SIP (Article)	NSPS (Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)
PF1.001	Dip Tank #1	.22017, .305, .3405, .346	445B.22017	N/A	N/A	N/A	N/A
PF1.002	Dip Tank #2	.22017, .305, .3405, .346	445B.22017	N/A	N/A	N/A	N/A
PF1.003	Bridge Dip Tank	.22017, .305, .3405, .346	445B.22017	N/A	N/A	N/A	N/A
PF1.004	Parts Washing	.22017, .305, .3405, .346	445B.22017	N/A	N/A	N/A	N/A
PF1.005	Welding Fabrication Operations	.22017, .305, .3405, .346, .22033	445B.22017 445B.22033	N/A	N/A	N/A	N/A
S2.001	Grey Paint Storage Tank	.22017, .305, .3405,	445B.22017	N/A	N/A	N/A	N/A
S2.002	Mineral Sprits Storage Tank	.22017, .305, .3405,	445B.22017	N/A	N/A	N/A	N/A

3.2.1 NEVADA REVISED STATUTES

The Nevada Revised Statutes (NRS) is the statutory authority for the adoption and implementation of administrative regulations. The statutes relating to the control of air pollution are contained in NRS 445B.100 through 445B.640. The NRS specifies that the State Environmental Commission is the governing body given the power to adopt administrative regulations. Because the NRS is the enabling statutory authority, very few specific requirements are contained in the statutes. Rather, the NRS provides, generally, broad authority for the adoption and implementation of air pollution control regulations.

3.2.2 NEVADA ADMINISTRATIVE CODE

The Nevada Administrative Code (NAC) is the administrative regulations that contain specific requirements relating to the control of air pollution. The State Environmental Commission adopts these regulations. The NAC requires that, where state regulations are more stringent in comparison to Federal regulations, the State regulations are applicable. The NAC sets forth, by rule, maximum emission standards for visible emissions (opacity), PM₁₀ and sulfur emitting processes. Other requirements are established for incinerators, storage tanks, odors and maximum concentrations of regulated air pollutants in the ambient air. Other NAC regulations specify the requirements for applying for and method of processing applications for operating permits. All of the equipment considered in this application must meet, at a minimum, the applicable standards and requirements set forth in the NAC. Specifically, the emission standards contained in NAC 445B.2203 for particulate matter, 445B.22017 for opacity and 445B.22097 for the ambient air quality standards must not be exceeded.

3.2.3 NEVADA APPLICABLE SIP (ASIP)

The Applicable State Implementation Plan (ASIP) is a document prepared by a State or Local air regulatory agency and required to submit to the U.S. EPA for approval. The Title I of the Clean Air Act is the statutory authority for the U.S. EPA regulations that require a State to submit a SIP. The contents of the SIP are intended to show how a State, through the implementation and enforcement of the regulations contained in the SIP, will either show how attainment of the national ambient air quality standards (NAAQS) will be achieved or how a State will continue to maintain compliance with the NAAQS. Nevada's most recent ASIP approved by the U.S. EPA is based on State regulations codified in 1982 with revisions/approvals as recently as April 9, 2008. In general, the regulations contained in the ASIP closely parallel the current NAC regulations. However, because the ASIP is partly based on older air quality regulations (at this time), compliance with all of the current NAC regulatory requirements does not necessarily ensure compliance with the ASIP requirements. All of the equipment considered in this application must meet, at a minimum, the standards set forth in the ASIP. Specifically, the emission standards contained in ASIP NAC 445B.22017 for maximum opacity and 445B.22097 for the ambient air quality standards must not be exceeded.

3.2.4 CODE OF FEDERAL REGULATIONS (CFR)

The Code of Federal Regulations (CFR) are regulations adopted by the U.S. EPA and published in the Federal Register pursuant to the authority granted by Congress in the Clean Air Act. The CFR addresses multiple aspects, including but not limited to, permitting requirements, performance standards, testing methods, and monitoring requirements.

3.2.4.1 New Source Performance Standards (NSPS)

The U.S. EPA has promulgated maximum emission standards and/or monitoring/ recordkeeping methods for selected source categories. These standards are contained in Title 40 of the CFR, Part 60, and are known

as the New Source Performance Standards (NSPS). The emission units are not considered an affected facility by any portion of CFR 40, Part 60. Therefore, the 20 percent opacity limitation (NAC 445B.22017) for visible emissions is utilized for each emission unit. Valley Joist, Inc. will monitor and record opacity at the emission points on an annual basis. This frequency is deemed suitable because the manufacturing process at these emissions units is not expected to produce emissions that would impact opacity.

3.2.4.2 National Emission Standards for Hazardous Air Pollutants (NESHAP)

The federal NESHAP provisions are contained in 40 CFR Parts 61 and 63. A summary of the emissions is contained in Section 4 of this review. HAP information was provided by the Permittee and reviewed by BAPC. BAPC's calculated HAP emissions were the same as the Permittee's. The total BAPC calculated HAP emissions for the facility are 5.624 tons per year, therefore, the Permittee is not a major emitter of HAPs (i.e. does not emit greater than 10 ST/yr of a single HAP or 25 ST/yr of a combination of HAP's). There is a proposed Maximum Achievable Control Technology (MACT) standard for Miscellaneous Metal Surface Coating scheduled for development by the EPA; however, this standard would not apply since the coatings used by Valley Joist, Inc., do not contain HAPs.

3.2.4.3 Prevention of Significant Deterioration Regulations (PSD)

These regulations specify federally required permitting procedures for each "major stationary source". The PSD regulations define a "stationary source" as *"any building, structure, facility, or installation which emits or may emit any air pollutant subject to regulation under the Act."* A "building structure facility or installation" is defined as *"all of the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control) except the activities of any vessel. Pollutant-emitting activities shall be considered as part of the same industrial grouping if they belong to the same 'Major Group' (i.e., which have the same first two digit code) as described in the Standard Industrial Classification Manual, 1972, as amended by the 1977 Supplement."*

"Major" is defined as the potential to emit of a stationary source, which equals or exceeds a specified threshold (in tons per year) of any air pollutant regulated under the Clean Air Act (40 CFR 52.21(b)(1)). The first threshold is for a stationary source that emits or has the potential to emit 100 tons per year or more and is defined as one of 28 specific categories of sources (see 40 CFR 52.21(b)(1)(i)(a)). The other applicability threshold is for any other stationary source that emits or has the potential to emit 250 tons per year (see 40 CFR 52.21(b)(1)(i)(b)). As mentioned above, the SIC code for this facility is 3441. Therefore, the major SIC grouping is 34, which is identified as Fabricated Metal Products in the SIC manual. However, none of the 28 specific categories is representative of this facility. Therefore, major source status is classified at the 250 tons per year emission threshold for any pollutant regulated under the Act. As identified in Section 4.0 of this review, the Permittee will have an emission cap to emit less than the 250 tons per year threshold for VOCs and, as such, is classified as a minor source for PSD purposes.

3.2.4.4 Compliance Assurance Monitoring (CAM)

The U.S. EPA has promulgated requirements for sources to provide detailed monitoring plans that will ensure compliance with all applicable requirements. These monitoring requirements are contained in 40 CFR Part 64. Section 64.2 specifies that these monitoring requirements apply to a "pollutant specific emission unit at a major source" if all of the following are satisfied:

- * The unit is subject to an emission limitation or standard;
- * The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- * The unit has potential pre-control device (uncontrolled) emissions equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

The key factors that would require the submission of a CAM plan are: 1) the facility must be defined as a "major source"; and 2) the units must be subject to an emission limitation or standard (acid rain limitations and standards are not included). None of the above conditions apply for this facility especially since Valley Joist's emissions are uncontrolled; therefore, a CAM is not required.

4.0 EMISSIONS INVENTORY

4.1 EMISSIONS

Attachment 3 contains a table summarizing the Permittee's proposed annual emission inventory, including insignificant sources. Table 4.0-1 summarizes the potential emissions, including insignificant sources, for the facility.

Table 4.0-1 – Emission Summary

Pollutant	Lbs/hour	Tons/year
PM	2.168	9.494
PM ₁₀	2.168	9.494
NO _x	1.175	5.146
SO ₂	0.049	0.216
CO	0.352	1.541
VOC	85.957	249.37
Total HAPS	1.284	5.624

All PM₁₀ and gaseous criteria pollutant emissions are estimated from appropriate emission factors, where available and applicable. The applicant has quantified all VOC emissions based on an operating schedule of 24 hours per day, 8,760 hours per year, unless otherwise denoted. The facility is currently using paints with no HAP content. The facility has proposed a facility-wide VOC cap and uses in-depth monitoring and recordkeeping to verify that the cap limits are not exceeded. As such, the facility has the flexibility to operate 8,760 hours per year, provided that the facility does not exceed its annual limitation of 249.0 tons VOC emissions. Monitoring and recordkeeping requirements quantify VOC emissions to compare against the annual facility-wide cap.

5.0 PREVENTION OF SIGNIFICANT DETERIORATION DETERMINATION

As discussed Section 3.2.4.3 above, 40 CFR Part 52.21 specifies that Prevention of Significant Deterioration (PSD) review is required for any new major stationary source or any major modification. A major source is defined as any pollutant emitting activities, which belong to the same two digit Source Industry Classification (SIC), and:

1. Emit 100 tons/yr or more of a regulated air contaminate as one of the listed categories of sources listed in 40 CFR 52.21; or
2. Emits 250 tons/yr or more of a regulated air contaminant and belong to any other category sources.

Since this facility is not classified as one of the listed categories of sources and the total potential to emit of a regulated pollutant is less than the 250 tons/yr, the facility is not a PSD source. Any relaxation of the limits specified in the final operating permit that increases the emissions above the applicable significant emission threshold will require a full PSD/NSR review of the source as though construction had not yet commenced.

6.0 AMBIENT AIR QUALITY IMPACT

The Valley Joist, Inc. facility is located within Hydrographic Basin 76. The purpose of the air quality analysis is to demonstrate that the emissions from the stationary source will not cause or contribute to a violation of any applicable federal or state ambient air quality standards prior to the issuance of an operating permit. The Permittee provided a Scheffe screening analysis for ozone increment impact as part of their application. The screen demonstrated compliance with the Ambient Air Quality Standards.

6.1 Particulate Emissions

In 2004, BAPC performed a Screen 3 model of the increase in PM_{10} emissions for Permit AP3411-0815.01 (expires November 26, 2008). Some simplifying assumptions were made when the model was performed in 2004. First, the building was simplified into a rectangle, using the widest and longest dimensions; second, it was assumed that the building controlled half of the emissions produced by the operations; third, BAPC assumed one roof "stack" by which the emissions would escape, at ambient temperatures, with minimal escape velocity, at the roof height, and in the center of the roof. The Screen model results are shown below in Table 6.0-1. The results demonstrated that the facility would not contribute to an exceedance of the ambient air quality standards.

Table 6.0-1 –SCREEN 3 Results

Pollutant	Standard ($\mu\text{g}/\text{m}^3$)		Model Results 286.3 ($\mu\text{g}/\text{m}^3$) (1-hour) @ (distance to max is 122 m)	Background ($\mu\text{g}/\text{m}^3$)	Final Result ($\mu\text{g}/\text{m}^3$)
	24-hour	Annual			
PM_{10}	150	50	114.54 (24-hr) 22.91 (Annual)	10.2 (24-hr) 9.0 (Annual)	124.74 (24-hour) 31.91 (Annual)

6.2 Ozone Increment Calculation

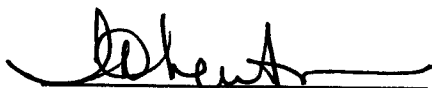
The Scheffe NMOC/NOx Point Source Screening procedure was submitted by the applicant to calculate the ozone increment due to this VOC dominated point source. The results of that Scheffe screening ozone increment table is provided in Attachment 3 (provided by the applicant).

The BAPQ also operates a continuous ozone ambient air quality analyzer in Fernley. This ozone data will be used to monitor trends in ozone levels in Fernley.

7.0 CONCLUSIONS / RECOMMENDATIONS

Based on the above review and supporting data and analyses, Valley Joist's request for a new Class I operating permit will not violate any applicable requirements. As a result, I recommend that the conditions specified in the proposed operating permit be issued.

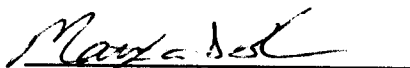
- Attachment (1) Facility and Vicinity Map
- Attachment (2) Emission Inventory and Tanks Report
- Attachment (3) Scheffe Screening Ozone Increment Table
- Attachment (4) Proposed Operating Permit



Ingrid Newton
Staff Engineer II
Bureau of Air Pollution Control

August 15, 2008

Date



Matthew A. DeBurle, P.E.
Supervisor, Class I Permitting Branch
Bureau of Air Pollution Control

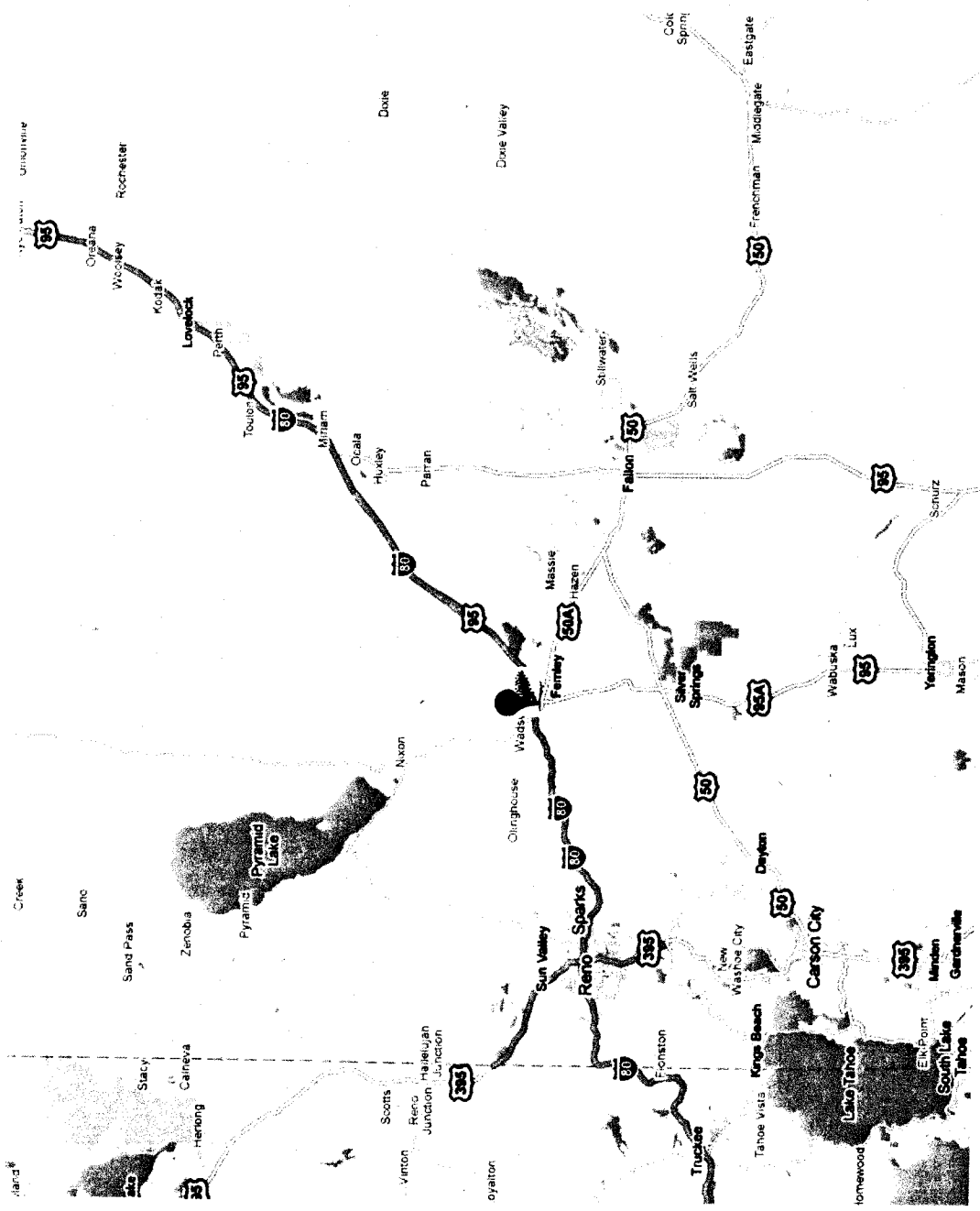
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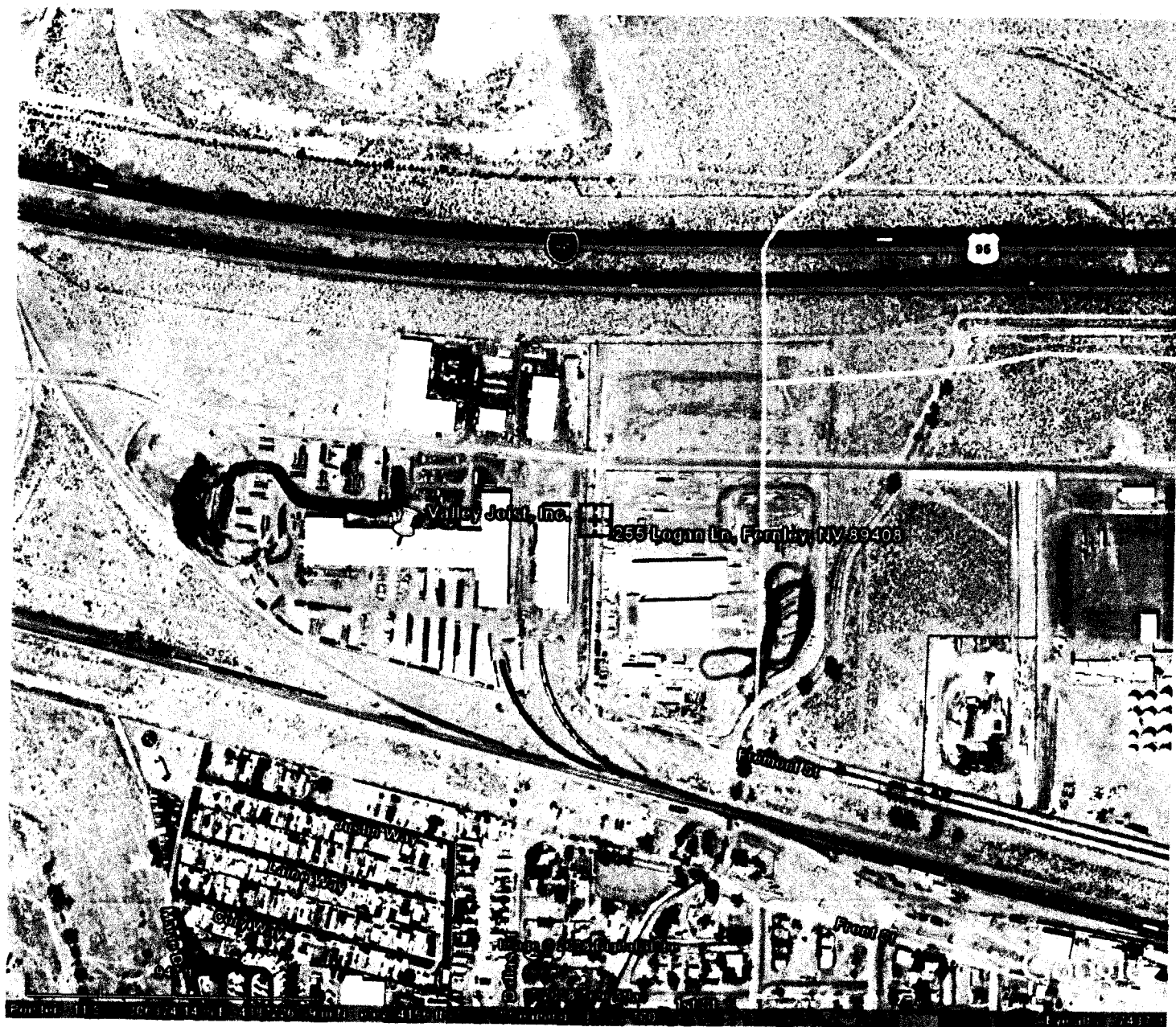
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Attachment 1

Facility (and Vicinity) Map

Google Maps Address





Attachment 2

Emission Inventory and Tanks Report

Unit	Description	Maximum Capacity		Daily Operating Hours		Operational Days per year	Volume Consumed		Emission Factors		VOC Emissions	
		Steel lb/yr	Coatings gal/yr	Standard	Maximum		Coatings gal/yr	Solvent gal/yr	Cutting lb/1000 lb Co	Solvent lb/1000 lb Co	BAPC lb/yr	Permit lb/yr
PF1.001	Dip Tank #1 (85' x 22' x 7')	3	3	8	24	365	9	1.8	3.18	6.44	40.212	176.129
PF1.002	Dip Tank #2 (80' x 34' x 42')	3	3	8	24	365	9	1.8	3.18	6.44	40.212	176.129
PF1.003	Bridge Dip Tank (28' x 26' x 26')	1	1.5	8	24	365	1.5	0.1	3.18	6.44	5.414	23.713
PF1.004	Paris Washing (5 gallon container)	0.05	0	8	8	365	0	0.005	3.18	6.44	0.032	0.141

† Facility may operate up to 8,760 hours per year, provided they stay within their VOC cap.

Only Emission Unit Affected by Modification Application	Description	Maximum Capacity		Daily Operating Hours		Operational Days per year	Volume Consumed		Emission Factors		VOC Emissions	
		Steel lb/yr	Coatings gal/yr	Standard	Maximum		Coatings gal/yr	Solvent gal/yr	Cutting lb/1000 lb Co	Solvent lb/1000 lb Co	BAPC lb/yr	Permit lb/yr
PF1.005	Fabrication Operations (cutting, bending, assembly, punching & welding) Building Control Factor 1.0	6	0.2	8	24	365	5.2	5.2	3.18	0.01	0.01	0.01

Unit	Description	Storage Capacity gallons	Throughput gallons/yr	VOC Emissions				Test Hgt feet	Test Diam feet
				BARC (Tanks 4.0) lb/yr	Permit (Mass Balance) lb/yr	Permit (Mass Balance) lb/yr	Vapor Pressure (psia) Solid Liquid		
S2.001	Gray Paint Storage Tank (8' x 16')	6,000	125,000	2.80E-03	0.012	10.0028	0.032878	16	8
S2.002	Mineral Spirits Storage (53' x 12')	2,000	12,000	6.08E-04	0.003	6.08E-04	0.032878	12	5.4
IA1.001	Diesel Storage Tank	250	10,000	6.28E-03	2.76E-04	6.28E-06	2.76E-04	6	3.75

Based on one barrel per hour flow rate.

† Based on an incorrect vapor pressure of 0.19 psia in application emission calculations

Insignificant Units

Unit	Description	Fuel	Consumption gal/yr	Heat Input MM Btu/yr	Emissions	Emission Factors (lb/MM Btu) AP-42, 3.3			
						PM ₁₀	NO _x	CO	TOC
IA1.031-IA1.034	Misc Diesel Engines (Forklifts) Assumed 140,000 Btu/gal; trivial as mobile source	Diesel	10,000	1,400	lb/yr	0.31	4.41	0.96	0.39

* Application used an assumed consumption of 5,914 gallons/yr, however throughput for diesel storage is 10,000 gallons.

Unit	Description	Fuel	Heat Input Btu/yr	Quantity gal/yr	Emissions	Emission Factors (lb/10 ⁶ gal) AP-42, 1.4			
						PM ₁₀	NO _x	CO	MUCC VOC
IA1.002-IA1.028	Miscellaneous Nat. Gas Heaters Assumed 1,000 Btu/gal & 8,760 hrs/yr for insignificance	Nat. Gas	5,000,000	5,000	lb/yr	7.8	0.038	0.40	5.6

Total Emissions (BAPC)	Unit	All Sources		Contribution from Insignificant Sources	
		lb/yr	lb/yr	lb/yr	lb/yr
PM10	Note 1	2,168	9,494	0.088	0.383
VOC		85,957	376,492	0.083	0.365
NO _x		1,175	5,146	N/C	N/C
CO		0.352	1,541	0.352	1.541
SO _x		0.049	0.216	0.049	0.216
HAP		1.284	5.624	N/C	N/C
(total)					

Note 1 The facility has a VOC cap of 249.37 tpy (include insigns) which is below PSD threshold of 250 tpy

TANKS 4.0 **Emissions Report - Detail Format** **Tank Identification and Physical Characteristics**

Identification
User Identification: Valley Joist Solvent AGT S2.002
City: Fernley
State: Nevada
Company: Valley Joist, Inc.
Type of Tank: Vertical Fixed Roof Tank
Description: Mineral Spirits/Solvent

Tank Dimensions
Shell Height (ft): 12.00
Diameter (ft): 5.40
Liquid Height (ft): 11.00
Avg. Liquid Height (ft): 6.00
Volume (gallons): 2,000.00
Turnovers: 5.92
Net Throughput (gal/yr): 12,000.00
Is Tank Heated (y/n): N

Paint Characteristics
Shell Color/Shade: Gray/Light
Shell Condition: Good
Roof Color/Shade: Gray/Light
Roof Condition: Good

Roof Characteristics
Type: Cone
Height (ft): 0.00
Slope (ft/ft) (Cone Roof): 0.06

Breather Vent Settings
Vacuum Settings (psig): -0.03
Pressure Settings (psig): 0.03

Meteorological Data used in Emissions Calculations: Reno, Nevada (Avg Atmospheric Pressure = 12.57 psia)

TANKS 4.0 **Emissions Report - Detail Format** **Liquid Contents of Storage Tank**

Mixture/Component	Month	Daily Liquid Surf. Temperatures (deg F)			Liquid Bulk Temp. (deg F)	Vapor Pressures (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Basis for Vapor Pressure Calculations	
		Avg	Min.	Max		Avg	Min	Max				Mol. Weight	Weight
Mineral Spirit	All	58.75	46.98	70.52	52.96	0.0387	0.0290	0.0400	130.0000			130.00	

TANKS 4.0

Emissions Report - Detail Format

Detail Calculations (AP-42)

Annual Emission Calculations		
Standing Losses (lb):		3.9292
Vapor Space Volume (cu ft):		138.7015
Vapor Density (lb/cu ft):		0.0009
Vapor Space Expansion Factor:		0.0869
Vented Vapor Saturation Factor:		0.9877
Tank Vapor Space Volume		
Vapor Space Volume (cu ft):		138.7015
Tank Diameter (ft):		5.4000
Vapor Space Outage (ft):		6.0563
Tank Shell Height (ft):		12.0000
Average Liquid Height (ft):		6.0000
Roof Outage (ft):		0.0563
Roof Outage (Cone Roof)		
Roof Outage (ft):		0.0563
Roof Height (ft):		0.0000
Roof Slope (ft/ft):		0.0625
Shell Radius (ft):		2.7000
Vapor Density		
Vapor Density (lb/cu ft):		0.0009
Vapor Molecular Weight (lb/lb-mole):		130.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):		0.0387
Daily Avg. Liquid Surface Temp. (deg. R):		518.4193
Daily Average Ambient Temp. (deg. F):		50.7417
Ideal Gas Constant R (psia cu ft / (lb-mol-deg R)):		10.731
Liquid Bulk Temperature (deg. R):		512.6517
Tank Paint Solar Absorptance (Shell):		0.5400
Tank Paint Solar Absorptance (Roof):		0.5400
Daily Total Solar Insulation Factor (Btu/sq ft day):		1,583.0451
Vapor Space Expansion Factor		
Vapor Space Expansion Factor:		0.0869
Daily Vapor Temperature Range (deg. R):		47.0716
Daily Vapor Pressure Range (psia):		0.0110
Breather Vent Press. Setting Range (psia):		0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):		0.0387
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):		0.0290
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):		0.0400
Daily Avg. Liquid Surface Temp. (deg. R):		518.4193
Daily Min. Liquid Surface Temp. (deg. R):		506.6514
Daily Max. Liquid Surface Temp. (deg. R):		530.1872
Daily Ambient Temp. Range (deg. R):		32.1333
Vented Vapor Saturation Factor		
Vented Vapor Saturation Factor:		0.9877
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):		0.0387
Vapor Space Outage (ft):		6.0563

TANKS 4.0 **Emissions Report - Detail Format** **Detail Calculations (AP-42)- (Continued)**

Working Losses (lb)	1.4374
Vapor Molecular Weight (lb/lb-mole)	130.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia)	0.0387
Annual Net Throughput (gal/yr.)	12,000,0000
Annual Turnovers	5.9200
Turnover Factor	1.0000
Maximum Liquid Volume (gal)	2,000,0000
Maximum Liquid Height (ft)	11.0000
Tank Diameter (ft)	5.4000
Working Loss Product Factor	1.0000
Total Losses (lb)	5.3667

TANKS 4.0
Emissions Report - Detail Format
Individual Tank Emission Totals

Annual Emissions Report

Components	Losses(lbs)	
	Working Loss	Breathing Loss
Mineral Spirit	1.44	3.93
		Total Emissions
		5.37

Attachment 3

Scheffe Screening Ozone Increment Table

Information Input for Screening Calculation	
Classification of Area	RURAL
Annual NMOC Emission for Facility	376.86 ST/yr
Annual NOx for Facility	5.1 ST/yr
Maximum NMOC Emission Rate	2065 lb/day 376.86 ST/yr
Calculations & Output	
NMOC/NOx Ratio	73.89
Lower Bound Max. NMOC Emiss. Rate	100
Upper Bound Max. NMOC Emiss. Rate	377
Lower Increment Value	0.4 pphm
Upper Increment Value	1.1 pphm
Interpolated Increment Value	1.100 pphm
Ozone Increment	0.010997 (pphm x 100)
Nevada Ambient Air Quality Standard for Ozone	0.12 (1-hour, ppm)
% of Standard	9.16
Concentration of Ozone	21.53486 ug/m3

Scheffe Screening Table (9/88) Rural O3 Increment Table pphm			
Max NMOC Tons/yr	>20.7	20.7 - 5.2	<5.2
0-50	0.4	0.4	1.1
50-75	0.4	0.4	1.2
75-100	0.4	0.5	1.4
100-300	0.8	1	1.7
300-500	1.1	1.4	1.9
500-750	1.6	1.9	2.3
750-1000	2	2.4	2.7
1000-1500	2.7	3	3.3
1500-2000	3.4	3.8	3.7
2000-3000	4.8	5.2	4.3
3000-5000	7	7.5	4.8
5000-7500	9.8	10.1	5.1
7500-10000	12.2	12.9	5.4

Attachment 4

Proposed Operating Permit



BUREAU OF AIR POLLUTION CONTROL

901 SOUTH STEWART STREET SUITE 4001

CARSON CITY, NEVADA 89701-5249

p: 775-687-9350 • www.ndep.nv.gov/bapc • f: 775-687-6396

Facility ID No. A0012

Permit No. AP3441-2437

**CLASS I AIR QUALITY OPERATING PERMIT
GENERAL REQUIREMENTS**

Issued to: Valley Joist, Inc., hereafter called the Permittee
Mailing Address: 255 LOGAN ROAD; FERNLEY, NEVADA 89408
Physical Address: 255 LOGAN ROAD; FERNLEY, NEVADA 89408
General Facility Location: Sec 11, T20N, R24E, MDB&M (HA 76)

Emission Unit List: 7 Emission Units

Coating & Welding Operations

A. System 01 – Surface Coating Dip Tank #1

PF 1.001 Dip Tank #1 (85' x 2'2" x 7')

B. System 02 – Surface Coating Dip Tank #2

PF 1.002 Dip Tank #2 (80' x 3'4" x 4'2")

C. System 03 – Bridging Dip Tank

PF 1.003 Bridging Dip Tank (25' x 2'6" x 2'6")

D. System 04 – Parts Washing

PF 1.004 Parts Washer (5 gallon container)

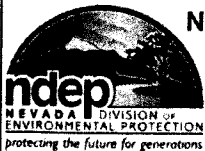
E. System 05 – Fabrication Operations

PF 1.005 Fabrication Operations (cutting, bending, assembly, punching and welding)

F. System 06 – Storage Tanks

S 2.001 Grey Paint Storage (8' x 16')

S 2.002 Mineral Spirits/Solvent Storage (5'3" x 12')



BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0012

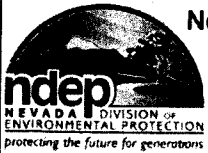
Permit No. AP3441-2437

**CLASS I AIR QUALITY OPERATING PERMIT
GENERAL REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section I. General Conditions

- A. Nevada Administrative Code (NAC) 445B.315.3.c, Part 70 Program Severability
Each of the conditions and requirements of this Operating Permit is severable and, if any are held invalid, the remaining conditions and requirements continue in effect.
- B. Nevada Revised Statute (NRS) 445B.470.1 (State Only Requirement)
Prohibited Acts
The Permittee shall not knowingly:
1. Violate any applicable provision, the terms or conditions of any permit or any provision for the filing of information;
 2. Fail to pay any fee;
 3. Falsify any material statement, representation or certification in any notice or report; or
 4. Render inaccurate any monitoring device or method, required pursuant to the provisions of NRS 445B.100 to 445B.450, inclusive, or NRS 445B.470 to 445B.640, inclusive, or any regulation adopted pursuant to those provisions.
- C. NAC 445B.22013 (State Only Requirement)
Prohibited Discharge
The Permittee shall not cause or permit the discharge into the atmosphere from any stationary source of any hazardous air pollutant or toxic regulated air pollutant that threatens the health and safety of the general public, as determined by the Director.
- D. NAC 445B.225 (State Only Requirement)
Prohibited Conduct: Concealment of Emissions
The Permittee shall not install, construct, or use any device which conceals any emission without reducing the total release of regulated air pollutants to the atmosphere.
- E. NAC 445B.315.3.d Part 70 Program Compliance/Noncompliance
The Permittee shall comply with all conditions of this Operating Permit. Any noncompliance constitutes a violation and is grounds for:
1. An action for noncompliance;
 2. Modifying, revoking, reopening and revising, or terminating the Operating Permit; or
 3. Denial of an application for a renewal of the Operating Permit.
- F. NAC 445B.273.1 (State Only Requirement)
Schedules for Compliance
The Permittee shall comply with NAC 445B.001 through 445B.3497, inclusive. Existing stationary sources are in compliance with those sections and may continue to operate under the provisions of their approved compliance schedules, which may be amended from time to time.
- G. NAC 445B.326.1 Part 70 Program Assertion of Emergency as Affirmative Defense to Action for Noncompliance
The Permittee may assert an affirmative defense to an action brought for noncompliance with a technology-based emission limitation contained in the Operating Permit if the holder of the Operating Permit demonstrates through signed, contemporaneous operating logs or other relevant evidence that:
1. An emergency occurred as defined in NAC 445B.056, and the holder of the Operating Permit can identify the cause of the emergency;
 2. The facility was being properly operated at the time of the emergency;
 3. During the emergency, the holder of the Operating Permit took all reasonable steps to minimize excess emissions; and
 4. The holder of the Operating Permit submitted notice of the emergency to the Director within 2 working days after the emergency. The notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken to restore the normal operation of the facility.
- H. NAC 445B.315.3.e Part 70 Program
The need to halt or reduce activity to maintain compliance with the conditions of this Operating Permit is not a defense to noncompliance with any conditions of this Operating Permit.
- I. NAC 445B.315.3.f Part 70 Program
The Director may revise, revoke and reissue, reopen and revise, or terminate the operating permit for cause.
- J. NAC 445B.325 Part 70 Program Termination, reopening and revision, modification, and revocation and reissuance
1. A Class I operating permit must be reopened and revised to incorporate any additional applicable requirement adopted pursuant to the Act if, on the effective date of the applicable requirement, the operating permit has a remaining term of 3 or more years. The reopening must be completed no later than 18 months after the effective date of the applicable requirement.
 2. An operating permit may be terminated, reopened and revised, modified, or revoked and reissued if:
 - a. The Director or the Administrator determines that the operating permit contains a material mistake or is based on inaccurate statements;



BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0012

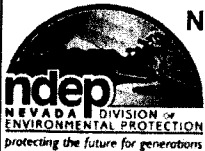
Permit No. AP3441-2437

**CLASS I AIR QUALITY OPERATING PERMIT
GENERAL REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section I. General Conditions (continued)

- b. The Director or the Administrator determines that the operating permit, as written, does not ensure compliance with all applicable requirements; or
 - c. The Director determines that there has been a violation of any of the provisions of NAC 445B.001 to 445B.3497, inclusive, any applicable requirement, or any condition contained in the operating permit.
- K. NAC 445B.3265 (State Only Requirement)
Revocation and reissuance
- 1. NAC 445B.3265.1. The Permittee's operating permit may be revoked if the control equipment is not operating.
 - 2. NAC 445B.3265.2. The Permittee's operating permit may be revoked by the Director upon determination that there has been a violation of NAC 445B.001 to 445B.3497, inclusive, or the provisions of 40 CFR Part 52.21, or 40 CFR Part 60 or 61, Prevention of Significant Deterioration, New Source Performance Standards, and National Emission Standards for Hazardous Air Pollutants adopted by reference in NAC 445B.221.
 - 3. NAC 445B.3265.3. -The revocation is effective 10 days after the service of a written notice, unless a hearing is requested.
- L. SIP 445.715 (Federally Enforceable SIP Requirement)
Operating Permits: Revocation
- 1. The Permittee's operating permit may be revoked if the control equipment is not operating.
 - 2. The Permittee's operating permit can be revoked by the Director upon determination that there has been a violation of SIP 445.430 to 445.846, inclusive, or 40 CFR Parts 60 or 61, New Source Performance Standards and National Emissions Standards for Hazardous Air Pollutants.
 - 3. The revocation is effective 10 days after the service of a written notice, and the revoked operating permit shall be surrendered immediately unless a hearing is requested.
- M. NAC 445B.315.3.g Part 70 Program
This Operating Permit does not convey any property rights or any exclusive privilege.
- N. NAC 445B.315.3.h Part 70 Program
The Permittee shall provide the Director, within a reasonable time, with any information that the Director requests in writing to determine whether cause exists for modifying, revoking and reissuing, reopening and revising or terminating this Operating Permit or to determine compliance with the conditions of this Operating Permit.
- O. NAC 445B.315.3.i Part 70 Program
The Permittee shall pay fees to the Bureau of Air Pollution Control in accordance with the provisions set forth in NAC 445B.327 and 445B.331.
- P. NAC 445B.315.3.j Part 70 Program
Right to Entry
The Permittee shall allow the Bureau of Air Pollution Control staff, upon the presentation of credentials, to:
- 1. Enter upon the premises of the Permittee where:
 - a. The stationary source is located;
 - b. Activity related to emissions is conducted; or
 - c. Records are kept pursuant to the conditions of this Operating Permit.
 - 2. Have access to and copy, during normal business hours, any records that are kept pursuant to the conditions of this Operating Permit;
 - 3. Inspect, at reasonable times, any facilities, practices, operations, or equipment, including any equipment for monitoring or controlling air pollution, that are regulated or required pursuant to this Operating Permit; and
 - 4. Sample or monitor, at reasonable times, substances or parameters to determine compliance with the conditions of this Operating Permit or applicable requirements.
- Q. NAC 445B.315.3.k Part 70 Program
A responsible official of the Permittee shall certify that, based on information and belief formed after reasonable inquiry, the statements made in any document required to be submitted by any condition of this Operating Permit are true, accurate and complete.
- R. 40 CFR 52.21(r)(4) (Federally Enforceable PSD Program)
At such time that the Permittee becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of 40 CFR Part 52.21 paragraphs (j) through (s) of this section shall apply to the source or modification as though construction had not yet commenced on the source or modification.
- S. NAC 445B.252 (State Only Requirement)
Testing and Sampling
- 1. To determine compliance with NAC 445B.001 to 445B.3497, inclusive, before the approval or the continuance of an Operating Permit or similar class of permits, the Director may either conduct or order the owner of any stationary source to conduct or have conducted such testing and sampling as the Director determines necessary. Testing and/or sampling must be conducted and the results submitted to the Director within 60 days after achieving the maximum rate of production at which the affected facility will be operated, but not later than 180 days after initial startup of the facility and at such times as may be required by the Director.



BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0012

Permit No. AP3441-2437

**CLASS I AIR QUALITY OPERATING PERMIT
GENERAL REQUIREMENTS**

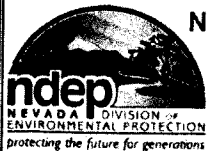
Issued to: Valley Joist, Inc., as Permittee

Section I. General Conditions (continued)

2. Tests of performance must be conducted and data reduced in accordance with the methods and procedures of the test contained in each applicable subsection of this section unless the Director:
 - a. Specifies or approves, in specific cases, the use of a method of reference with minor changes in methodology;
 - b. Approves the use of an equivalent method;
 - c. Approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific stationary source is in compliance; or
 - d. Waives the requirement for tests of performance because the owner or operator of a stationary source has demonstrated by other means to the Director's satisfaction that the affected facility is in compliance with the standard.
3. Tests of performance must be conducted under such conditions as the Director specifies to the operator of the plant based on representative performance of the affected facility. The owner or operator shall make available to the Director such records as may be necessary to determine the conditions of the test of performance. Operations during periods of startup, shutdown, and malfunction must not constitute representative conditions of a test of performance unless otherwise specified in the applicable standard.
4. The owner or operator of an affected facility shall give notice to the Director 30 days before the test of performance to allow the Director to have an observer present. A written testing procedure for the test of performance must be submitted to the Director at least 30 days before the test of performance to allow the Director to review the proposed testing procedures.
5. Each test of performance must consist of at least three separate runs using the applicable method for that test. Each run must be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the runs apply. In the event of forced shutdown, failure of an irreplaceable portion of the sampling train, extreme meteorological conditions, or other circumstances with less than three valid samples being obtained, compliance may be determined using the arithmetic mean of the results of the other two runs upon the Director's approval.
6. All testing and sampling will be performed in accordance with recognized methods as specified by the Director.
7. The cost of all testing and sampling and the cost of all sampling holes, scaffolding, electric power, and other pertinent allied facilities as may be required and specified in writing by the Director must be provided and paid for by the owner of the stationary source.
8. All information and analytical results of testing and sampling must be certified as to their truth and accuracy and as to their compliance with all provisions of these regulations, and copies of these results must be provided to the Director no later than 60 days after the testing or sampling, or both.

**T. SIP 445.682 (Federally Enforceable SIP Requirement)
Testing and Sampling**

1. To determine compliance with SIP 445.430 to 445.846, inclusive, prior to approval of or prior to the continuance of an operating permit or similar class of permits, the Director may either conduct or order the owner of any source to conduct or have conducted such testing and sampling as the Director determines necessary. Testing and/or sampling must be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Director.
2. Performance tests must be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart unless the Director:
 - a. Specifies or approves, in specific cases, the use of a reference method with minor changes in methodology;
 - b. Approves the use of an equivalent method;
 - c. Approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance; or
 - d. Waives the requirement for performance tests because the owner or operator of a source has demonstrated by other means to the Director's satisfaction that the affected facility is in compliance with the standard.
3. Performance tests shall be conducted under such conditions as the Director shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Director such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown and malfunction must not constitute representative conditions of performance tests unless otherwise specified in the applicable standard.
4. The owner or operator of an affected facility shall provide the Director 30 days' prior notice of the performance test to afford the Director the opportunity to have an observer present.
5. Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the runs shall apply. In the event of forced shutdown, failure of an irreplaceable portion of the sampling train, extreme meteorological conditions, or other circumstances with less than two valid samples being obtained, an additional performance test must be conducted.
6. All testing and sampling will be performed in accordance with recognized methods as specified by the Director.
7. The cost of all testing and sampling and the cost of all sampling holes, scaffolding, electric power, and other pertinent allied facilities as may be required and specified in writing by the Director shall be provided and paid for by the owner of the source.
8. All information and analytical results of testing and sampling shall be certified as to their truth and accuracy and as to their compliance with all provisions of these (SIP) regulations and copies of these results must be provided to both the owner and Director.



BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0012

Permit No. AP3441-2437

**CLASS I AIR QUALITY OPERATING PERMIT
GENERAL REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section I. General Conditions (continued)

U. NAC 445B.22067 (Federally Enforceable SIP Requirement)

Open Burning

1. The open burning of any combustible refuse, waste, garbage, oil, or for any salvage operations, except as specifically exempted, is prohibited.
2. Specific exemptions from open burning are described in NAC 445B.22067.2.
3. All open burning shall be attended and controlled at all times to eliminate fire hazards.

V. NAC 445B.22017 (Federally Enforceable SIP Requirement)

Visible Emissions: Maximum Opacity: Determination and Monitoring of Opacity.

1. Except as otherwise provided in this section and NAC 445B.2202, no owner or operator may cause or permit the discharge into the atmosphere from any emission unit which is of an opacity equal to or greater than 20 percent. Opacity must be determined by one of the following methods:
 - a. If opacity is determined by a visual measurement, it must be determined as set forth in Reference Method 9 in Appendix A of 40 C.F.R. Part 60.
 - b. If a source uses a continuous monitoring system for the measurement of opacity, the data must be reduced to 6-minute averages as set forth in 40 C.F.R. §§ 60.13(h).
2. The provisions of this section and NAC 445B.2202 do not apply to that part of the opacity that consists of uncombined water. The burden of proof to establish the application of this exemption is upon the person seeking to come within the exemption.
3. If the provisions of 40 CFR Part 60, Subpart D or Da apply to an emission unit, the emission unit shall be allowed one 6-minute period per hour of not more than 27 percent opacity as set forth in 40 CFR § 60.42(a)(2) AND 40 CFR § 60.42a(b).
4. The continuous monitoring system for monitoring opacity at a facility shall be operated and maintained by the owner or operator specified in the permit for the facility in accordance with NAC 445B.256 to 445B.267, inclusive.

W. NAC 445B.22087 (State Only Requirement)

Odors

The Permittee may not discharge or cause to be discharged, from any stationary source, any material or regulated air pollutant which is or tends to be offensive to the senses, injurious or detrimental to health and safety, or which in any way interferes with or prevents comfortable enjoyment of life or property.

X. NAC 445B.319, 445B.342, 445B.3425 and 445B.344 (Part 70 Program)

Any changes to this Operating Permit will comply with all provisions established under NAC 445B.319, 445B.342, 445B.3425 and 445B.344.

Y. NAC 445B.3443 (Part 70 Program)

Renewal of this Operating Permit will be in accordance with NAC 445B.3443.

Z. NAC 445B.22037 (Federally Enforceable SIP Requirement)

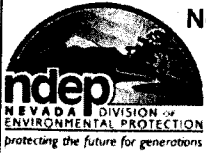
Emissions of Particulate Matter: Fugitive Dust

1. The Permittee may not cause or permit the handling, transporting, or storing of any material in a manner which allows or may allow controllable particulate matter to become airborne.
2. Except as otherwise provided in subsection 4, the Permittee may not cause or permit the construction, repair, demolition, or use of unpaved or untreated areas without first putting into effect an ongoing program using the best practical methods to prevent particulate matter from becoming airborne. As used in this subsection, "best practical methods" includes, but is not limited to, paving, chemical stabilization, watering, phased construction, and revegetation.
3. Except as provided in subsection 4, the Permittee may not disturb or cover 5 acres or more of land or its topsoil until The Permittee has obtained an Operating Permit for surface area disturbance to clear, excavate, or level the land or to deposit any foreign material to fill or cover the land.
4. The provisions of subsections 2 and 3 do not apply to:
 - a. Agricultural activities occurring on agricultural land; or
 - b. Surface disturbances authorized by a permit issued pursuant to NRS 519A.180 which occur on land which is not less than 5 acres or more than 20 acres.

AA. NAC 445B.308 (State Only Requirement)

RESERVED

*******End of General Conditions*******



Nevada Department of Conservation and Natural Resources • Division of Environmental Protection

BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0012

Permit No. AP3441-2437

CLASS I AIR QUALITY OPERATING PERMIT

GENERAL REQUIREMENTS

Issued to: Valley Joist, Inc., as Permittee

Section II. General Construction Conditions

No construction conditions applicable

*******End of General Construction Conditions*******



BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0012

Permit No. AP3441-2437

**CLASS I AIR QUALITY OPERATING PERMIT
GENERAL REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section III. General Operating Conditions

A. NAC 445B.227 Part 70 Program

Facilities Operation

The Permittee may not:

1. Operate a stationary source of air pollution unless the control equipment for air pollution which is required by applicable requirements or conditions of this Operating Permit is installed and operating.
2. Disconnect, alter, modify or remove any of the control equipment for air pollution or modify any procedure required by an applicable requirement or condition of this Operating Permit.

B. NAC 445B.232 (State Only Requirement)

Excess Emissions

1. Scheduled maintenance or testing or scheduled repairs which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.3497, inclusive, must be approved by the Director and performed during a time designated by the Director as being favorable for atmospheric ventilation.
2. The Director must be notified in writing of the time and expected duration at least 24 hours in advance of any scheduled maintenance which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.3497, inclusive.
3. The Director must be notified in writing or by telephone of the time and expected duration at least 24 hours in advance of any scheduled repairs which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.3497, inclusive.
4. The Director must be notified of any excess emissions within 24 hours after any malfunction or upset of the process equipment or equipment for controlling pollution or during startup or shutdown of such equipment. The telephone number for the notification is (775) 687-9350.
5. The Permittee, as the owner or operator of an affected facility, shall provide the Director, within 15 days after any malfunction, upset, startup, shutdown, or human error which results in excess emissions, sufficient information to enable the Director to determine the seriousness of the excess emissions. The information must include at least the following:
 - a. The identity of the stack or other point of emission, or both, where the excess emissions occurred.
 - b. The estimated magnitude of the excess emissions expressed in opacity or in units of the applicable limitation on emission and the operating data and methods used in estimating the magnitude of the excess emissions.
 - c. The time and duration of the excess emissions.
 - d. The identity of the equipment causing the excess emissions.
 - e. If the excess emissions were the result of a malfunction, the steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunction.
 - f. The steps taken to limit the excess emissions.
 - g. Documentation that the equipment for controlling air pollution, process equipment, or processes were at all times maintained and operated, to a maximum extent practicable, in a manner consistent with good practice for minimizing emissions.

C. SIP 445.667 (Federally Enforceable SIP Requirement)

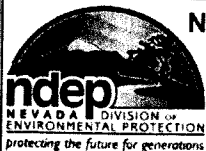
Excess Emissions: Scheduled Maintenance: Testing: Malfunctions

1. Scheduled maintenance or testing approved by the Director or repairs which may result in excess emissions of air contaminants prohibited by SIP 445.430 to 445.846, inclusive, must be performed during a time designated by the Director as being favorable for atmospheric ventilation.
2. The Director shall be notified in writing on the time and expected duration at least 24 hours in advance of any scheduled maintenance or repairs which may result in excess emissions of air contaminants prohibited by SIP 445.430 to 445.846, inclusive.
3. The Director must be notified within 24 hours after any malfunction, breakdown or upset of process or pollution control equipment or during startup of such equipment. Phone (775) 687-9350.
4. The owner or operator of an affected facility shall provide the Director, within 15 days after any malfunction, breakdown, upset, startup or human error sufficient information to enable the Director to determine the seriousness of the excess emissions. The submission must include as a minimum:
 - a. The identity of the stack and/or other emission point where the excess emission occurred.
 - b. The estimated magnitude of the excess emissions expressed in opacity or in the units of the applicable emission limitation and the operating data and methods used in estimating the magnitude of the excess emissions.
 - c. The time and duration of the excess emissions.
 - d. The identity of the equipment causing the excess emissions.
 - e. If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunctions.
 - f. The steps taken to limit the excess emissions.
 - g. Documentation that the air pollution control equipment, process equipment or processes were at all times maintained and operated, to a maximum extent practicable, in a manner consistent with good practice for minimizing emissions.

D. SIP Article 2.5.4 (Federally Enforceable SIP Requirement)

1. Breakdown or upset, determined by the Director to be unavoidable and not the result of careless or marginal operations, shall not be considered a violation of these regulations.

*******End of General Operating Conditions*******



BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0012

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**CLASS I AIR QUALITY OPERATING PERMIT
GENERAL REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section IV. Federal Regulations and Applicable Requirements

- A. The following provisions are applicable requirements of this Operating Permit:
1. The Permittee will comply with all applicable provisions of:
 - a. 40 CFR Part 60.1 - 60.19 - Standards of Performance for New Stationary Sources - General Provisions;
 - b. 40 CFR Part 61.01 - 61.19 - National Emission Standards for Hazardous Air Pollutants - General Provisions;
 - c. 40 CFR Part 61.140 - 61.157 - National Emission Standard for Asbestos;
 - d. 40 CFR Part 63.1 - 63.15 - National Emission Standards for Hazardous Air Pollutants for Source Categories - General Provisions;
 - e. 40 CFR Part 70 - State Operating Permit Programs.
 2. This provision is applicable if the Permittee is subject to 40 CFR Part 68 - Chemical Accident Prevention Provisions. The Permittee shall submit a risk management plan (RMP) by dates specified in 40 CFR 68.10. The Permittee shall certify compliance with these requirements as part of the annual compliance certification as required by 40 CFR Part 70.
 3. This provision is applicable if the Permittee is subject to 40 CFR Part 82. The Permittee will comply with all provisions of 40 CFR Part 82. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156. Equipment used during maintenance, service, repair, or disposal of appliances must meet the standards for recycling and recovery equipment in accordance with 40 CFR 82.158. Persons performing maintenance, service, repair or disposal of appliances must be certified by a certified technician pursuant to 40 CFR 82.161.

*******End of Federal Regulations and Applicable Requirements*******



BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0012

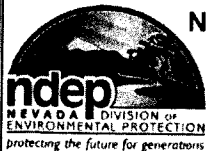
Permit No. AP3441-2437

**CLASS I AIR QUALITY OPERATING PERMIT
GENERAL REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section V. General Monitoring, Recordkeeping, and Reporting Requirements

- A. NAC 445B.315.3.(b) Part 70 Program
The Permittee shall retain records of all required monitoring data and supporting information for 5 years from the date of the sample collection, measurement, report or analysis. Supporting information includes, but is not limited to, all records regarding calibration and maintenance of the monitoring equipment and all original strip-chart recordings for continuous monitoring instrumentation.
- B. NAC 445B.3405.1.(d) Part 70 Program
The Permittee will record:
1. Monitoring information required by the conditions of this permit including the date, the location and the time of the sampling or the measurements and the operating conditions at the time of the sampling or measurements; and
 2. The date on which the analyses were performed, the company that performed them, the analytical techniques that the company used, and the results of such analyses.
- C. NAC 445B.3405.1.(e) Part 70 Program
The Permittee will:
1. Promptly report to the Director all deviations from the requirements of this Operating Permit; and
 2. Report to the Director the probable cause of all deviations and any action taken to correct the deviations. For this Operating Permit, prompt is defined as submittal of a report within 15 days of the deviation. This definition does not alter any reporting requirements as established for reporting of excess emissions as required under NAC 445B.232 and under Section III.B of this permit, or for reporting of an emergency (as defined by NAC 445B.326) under Section I.I. of this permit; and
 3. Submit reports of any required monitoring every 6 months, within 8 weeks after June 30 and December 31 of each calendar year. The reports must contain a summary of the data collected as required by all monitoring, recordkeeping and compliance requirements and as specified in sections VI and VII of this operating permit.
- D. NAC 445B.315.3.(h) Part 70 Program
The Permittee will submit yearly reports including, but not limited to, throughput, production, fuel consumption, hours of operation, and emissions. These reports will be submitted on the form provided by the Bureau of Air Pollution Control for all emission units/systems specified on the form. The completed form must be submitted to the Bureau of Air Pollution Control no later than March 1 annually for the preceding calendar year, unless otherwise approved by the Bureau of Air Pollution Control.
- E. NAC 445B.3405.1.(j) Part 70 Program
1. The Permittee will submit a compliance certification for all applicable requirements, reflecting the terms and conditions of the permit, to the Administrator of the Division of Environmental Protection and the Administrator of USEPA annually, on or before March 1 for the preceding calendar year. The compliance certification must include:
 - a. An identification of each term or condition of the Operating Permit that is the basis of the certification;
 - b. The status of the stationary source's compliance with any applicable requirement;
 - c. A statement of whether compliance was continuous or intermittent;
 - d. The method used for determining compliance; and
 - e. Any other facts the Director determines to be necessary to determine compliance.
- F. NAC 445B.265 (Federally Enforceable SIP Requirement)
Monitoring systems: Records: Reports
1. The Permittee subject to the provisions of NAC 445B.256 to 445B.267, inclusive, shall maintain records of the occurrence and duration of any start-up, shutdown or malfunction in the operation of an affected facility and any malfunction of the air pollution control equipment or any periods during which a continuous monitoring system or monitoring device is inoperative.
 2. The Permittee required to install a continuous monitoring system shall submit a written report of excess emissions to the director for every calendar quarter. All quarterly reports must be postmarked by the 30th day following the end of each calendar quarter and must include the following information:
 - a. The magnitude of excess emissions computed in accordance with NAC 445B.256 to 445B.267, inclusive, any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.
 - b. Specific identification of each period of excess emissions that occurs during start-ups, shutdowns and malfunctions of the affected facility.
 - c. The nature and cause of any malfunction, if known, the corrective action taken or preventative measures adopted.
 - d. Specific identification of each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of any repairs or adjustments that were made.
 - When no excess emissions have occurred and the continuous monitoring system has not been inoperative, repaired or adjusted, such information shall be included in the report.
 3. The Permittee subject to the provisions of NAC 445B.256 to 445B.267, inclusive, shall maintain a file of all measurements, including:
 - a. Continuous monitoring systems, monitoring devices and performance testing measurements;
 - b. All continuous monitoring system performance evaluations;
 - c. All continuous monitoring systems or monitoring device calibration checks;
 - d. Adjustments and maintenance performed on these systems or devices; and
 - e. All other information required by NAC 445B.256 to 445B.267, inclusive, recorded in a permanent form suitable for inspection.
 - The file shall be retained for at least 2 years following the date of the measurements, maintenance, reports and records.



Nevada Department of Conservation and Natural Resources • Division of Environmental Protection

BUREAU OF AIR POLLUTION CONTROL

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CLASS I AIR QUALITY OPERATING PERMIT

GENERAL REQUIREMENTS

Issued to: Valley Joist, Inc., as Permittee

Section V. General Monitoring, Recordkeeping, and Reporting Requirements
(continued)

G. NAC 445B.063 State-Only Requirement

The Department may use any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed, to determine excess emissions.

*******End of General Monitoring and Recordkeeping Conditions*******



BUREAU OF AIR POLLUTION CONTROL

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Permit No. AP3441-2437

**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section VI. Specific Operating Conditions

A. Emission Unit #PF1.001 location North 4386.09 km, East 306.04 km, UTM (Zone 11)

System 01 – Surface Coating Dip Tank #1

PF	1.001	Dip Tank #1 (85' x 2'2" x 7')
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1. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Air Pollution Equipment

PF1.001 shall be operated in a manner which ensures compliance with emission limitations and the opacity standard.

2. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Emission Limits

On and after the date of startup of PF1.001, Permittee will not discharge or cause the discharge into the atmosphere the following pollutants in excess of the following specified limits:

- NAC 445B.305 Part 70 Program – The combined discharge of VOC (volatile organic compounds) to the atmosphere for PF1.001 and any other VOC containing material utilized for truss manufacturing and coating/clean-up processes will not exceed the emissions limitations set forth in Section VII A.1.a. of this permit.
- NAC 445B.22017 (Federally Enforceable SIP Requirement) – The opacity from PF1.001 will not equal or exceed 20% in accordance with NAC 445B.22017.

3. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Operating Parameters

- PF1.001 may contain paint/coating material and/or mineral spirits (Stoddard) solvent only.
- PF1.001 may not use any paint/coating material and/or solvent which contains a Hazardous Air Pollutant (HAP) component.
- Hours
(1) PF1.001 may operate 8,760 hours per calendar year.

4. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Monitoring, Record keeping and Compliance

Permittee, upon issuance date of this permit will:

- Comply with the requirements of Section VII.A.2 Monitoring, Recordkeeping, Reporting and Compliance upon the issuance date of this permit.

5. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Shielded Requirements

No specific shield requested.



BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0012

Permit No. AP3441-2437

**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section VI. Specific Operating Conditions (continued)

B. Emission Unit #PF1.002 location North 4386.09 km, East 306.04 km, UTM (Zone 11)

System 02 – Surface Coating Dip Tank #2

PF	1.002	Dip Tank #2 (80' x 3'4" x 4'2")
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1. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Air Pollution Equipment
PF1.002 shall be operated in a manner which ensures compliance with emission limitations and the opacity standard.
2. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Emission Limits
On and after the date of startup of PF1.002, Permittee will not discharge or cause the discharge into the atmosphere the following pollutants in excess of the following specified limits:
 - a. NAC 445B.305 Part 70 Program – The combined discharge of VOC (volatile organic compounds) to the atmosphere for PF1.002 and any other VOC containing material utilized for truss manufacturing and coating/clean-up processes will not exceed the emissions limitations set forth in Section VII A.1.a. of this permit.
 - b. NAC 445B.22017 (Federally Enforceable SIP Requirement) – The opacity from PF1.002 will not equal or exceed 20% in accordance with NAC 445B.22017.
3. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Operating Parameters
 - a. PF1.002 may contain paint/coating material and/or mineral spirits (Stoddard) solvent only.
 - b. PF1.002 may not use any paint/coating material and/or solvent which contains a Hazardous Air Pollutant (HAP) component.
 - c. Hours
(1) PF1.002 may operate 8,760 hours per calendar year.
4. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Monitoring, Record keeping and Compliance
Permittee, upon issuance date of this permit will:
 - a. Comply with the requirements of Section VII.A.2 Monitoring, Recordkeeping, Reporting and Compliance upon the issuance date of this permit.
5. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Shielded Requirements
No specific shield requested.



BUREAU OF AIR POLLUTION CONTROL

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**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

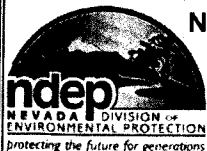
Issued to: Valley Joist, Inc., as Permittee

Section VI. Specific Operating Conditions (continued)

C. Emission Unit #PF1.003 location North 4386.09 km, East 306.04 km, UTM (Zone 11)

System 03 – Bridging Dip Tank		
PF	1.003	Bridging Dip Tank (25' x 2'6" x 2'6")

1. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Air Pollution Equipment
PF1.003 shall be operated in a manner which ensures compliance with emission limitations and the opacity standard.
2. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Emission Limits
On and after the date of startup of PF1.003, Permittee will not discharge or cause the discharge into the atmosphere the following pollutants in excess of the following specified limits:
 - a. NAC 445B.305 Part 70 Program – The combined discharge of VOC (volatile organic compounds) to the atmosphere for PF1.003 and any other VOC containing material utilized for truss manufacturing and coating/clean-up processes will not exceed the emissions limitations set forth in Section VII A.1.a. of this permit.
 - b. NAC 445B.22017 (Federally Enforceable SIP Requirement) – The opacity from PF1.003 will not equal or exceed 20% in accordance with NAC 445B.22017.
3. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Operating Parameters
 - a. PF1.003 may contain paint/coating material and/or mineral spirits (Stoddard) solvent only.
 - b. PF1.003 may not use any paint/coating material and/or solvent which contains a Hazardous Air Pollutant (HAP) component.
 - c. Hours
 - (1) PF1.003 may operate 8,760 hours per calendar year.
4. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Monitoring, Record keeping and Compliance
Permittee, upon issuance date of this permit will:
 - a. Comply with the requirements of Section VII.A.2 Monitoring, Recordkeeping, Reporting and Compliance upon the issuance date of this permit.
5. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Shielded Requirements
No specific shield requested.



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**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section VI. Specific Operating Conditions (continued)

D. Emission Unit #PF1.004 location North 4386.09 km, East 306.04 km, UTM (Zone 11)

System 04 – Parts Washing

PF	1.004	Parts Washer (5 gallon container)
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1. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Air Pollution Equipment

PF1.004 shall be operated in a manner which ensures compliance with emission limitations and the opacity standard.

2. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Emission Limits

On and after the date of startup of PF1.004, Permittee will not discharge or cause the discharge into the atmosphere the following pollutants in excess of the following specified limits:

- a. NAC 445B.305 Part 70 Program – The combined discharge of VOC (volatile organic compounds) to the atmosphere for PF1.004 and any other VOC containing material utilized for truss manufacturing and coating/clean-up processes will not exceed the emissions limitations set forth in Section VII A.1.a. of this permit.
- b. NAC 445B.22017 (Federally Enforceable SIP Requirement) – The opacity from PF1.004 will not equal or exceed 20% in accordance with NAC 445B.22017.

3. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Operating Parameters

- a. PF1.004 may contain mineral spirits (Stoddard) solvent only.
- b. PF1.004 may not use any solvent which contains a Hazardous Air Pollutant (HAP) component.
- c. Hours
(1) PF1.004 may operate 8,760 hours per calendar year.

4. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Monitoring, Record keeping and Compliance

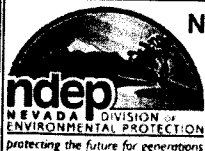
Permittee, upon issuance date of this permit will:

- a. Comply with the requirements of Section VII.A.2 Monitoring, Recordkeeping, Reporting and Compliance upon the issuance date of this permit.

5. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Shielded Requirements

No specific shield requested.



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**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section VI. Specific Operating Conditions (continued)

E. Emission Unit #PF1.005 location North 4386.09 km, East 306.04 km, UTM (Zone 11)

System 05 – Fabrication Operations

PF	1.005	Fabrication Operations (cutting, bending, assembly, punching, and welding)
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1. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Air Pollution Equipment

PF1.005 shall be operated in a manner which ensures compliance with emission limitations and the opacity standard. Emissions from fabrication operations are partially controlled within the confines of the building.

2. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Emission Limits

On and after the date of startup of P1.005, Permittee will not discharge or cause the discharge into the atmosphere the following pollutants in excess of the following specified limits:

- NAC 445B.305 Part 70 Program - The discharge of PM₁₀ (particulate matter less than 10 microns in diameter) to the atmosphere will not exceed 2.080 pounds per hour, nor more than 9.110 tons per year.
- NAC 445B.22033 (*Federally Enforceable SIP Requirement*) The discharge of PM₁₀ to the atmosphere will not exceed 2.080 pounds per hour maximum allowable emission limit and the maximum allowable throughput as limited by E.3.a. of this section.
- NAC 445B.305 Part 70 Program - The discharge of PM (particulate matter) to the atmosphere will not exceed 2.080 pounds per hour, nor more than 9.110 tons per year.
- The discharge of HAP into the atmosphere will not exceed the limits specified in Section VII, Emission Caps.
- NAC 445B.22017 (*Federally Enforceable SIP Requirement*) – The opacity from PF1.005 will not equal or exceed 20% in accordance with NAC 445B.22017.

3. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Operating Parameters

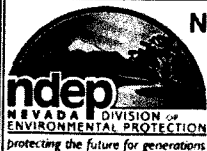
- The maximum consumption rate for PF1.005 will not exceed 0.365 ton of weldaments per any one-hour period.
- Hours
 - PF1.005 may operate 8,760 hours per calendar year.

4. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Monitoring, Record keeping and Compliance

Permittee, upon issuance date of this permit will:

- Monitor the consumption rate of weldaments for PF1.005 on a monthly basis.
- Monitor the hours of operation for PF1.005 on a daily basis.
- Monitor and record the single and combined HAP emissions in tons/month and tons/year.
- Maintain in a contemporaneous log the following recordkeeping for the required monitoring established in (a) and (b) of this section:
 - The calendar date of any required monitoring.
 - The total daily consumption rate of weldaments in tons, for the preceding month.
 - The total daily hours of operation for the corresponding date.
 - The monthly hours of operation, and the corresponding sum of hours of operation for the calendar year. The monthly hours of operation will be determined at the end of each calendar month as the sum of daily hours of operation as determined in (2) above for each day of the preceding calendar month.
 - The single and combined HAP emission rate in tons/month will be determined at the end of each calendar month as the sum of each HAP emission rate as determined from the concentration of hazardous constituents identified in the weldaments.
 - The annual emission rate for single and combined HAPs will be determined at the end of each calendar month as the sum of the monthly emission rates for the 12 immediately preceding calendar months.



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**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section VI. Specific Operating Conditions (continued)

E. Emission Unit #PF1.005 continued

- (5) The corresponding average hourly weld wire consumption rate in tons per hour. The average hourly consumption rate will be determined from the total monthly consumption rate and the total monthly hours of operation as determined in (3) and (4) above. The average hourly weld wire consumption rate will be monitored to ensure compliance with 3.a. of this section.

5. NAC 445B.3405 (NAC 445B.316) Part 70 Program
Shielded Requirements
No specific shield requested.



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**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section VI. Specific Operating Conditions (continued)

F. Emission Units #S2.001 and S2.002 location North 4386.09 km, East 306.04 km, UTM (Zone 11)

System 06 – Storage Tanks		
S	2.001	Grey Paint Storage (8' x 16')
S	2.002	Mineral Spirits/Solvent Storage (5'3" x 12')

1. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Air Pollution Equipment

Control system consisting of a fixed roof.

Tank 1 (S2.001)

Inside Diameter (ft): 8

Height (ft): 16

Capacity (gallons): 6,000

True Vapor Pressure (psia): 0.0329

Tank 2 (S2.002)

Inside Diameter (ft): 5.4

Height (ft): 12

Capacity (gallons): 2,000

True Vapor Pressure (psia): 0.0387

2. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Emission Limits

On and after the date of startup of S2.001 and S2.002, Permittee will not discharge or cause the discharge into the atmosphere from S2.001 and S2.002, the following pollutants in excess of the following specified limits:

- NAC 445B.305 Part 70 Program – The combined discharge of VOC (volatile organic compounds) to the atmosphere for PF1.001, PF1.002, PF1.003, PF1.004, PF1.005, S2.001 and S2.002 combined, and any other VOC containing material utilized for truss manufacturing and coating/clean-up processes will not exceed the emissions limitations set forth in Section VII A.1.a. of this permit.
- NAC 445B.22017 (Federally Enforceable SIP Requirement) – The opacity from S2.001 and S2.002 will not equal or exceed 20% in accordance with NAC 445B.22017.

3. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Operating Parameters

- S2.001 and S2.002 may store the following only:
 - S2.001 may store grey paint/coating material only.
 - S2.002 may store mineral spirits (Stoddard) solvent only.
- S2.001 and S2.002 may not store any paint/coating material and/or solvent which contains an HAP component.
- Hours
 - S2.001 and S2.002 may operate 8,760 hours per calendar year.

4. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Monitoring, Record keeping and Compliance

Permittee, upon issuance date of this permit will:

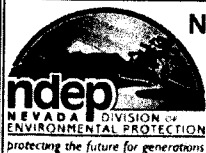
- Comply with the requirements of Section VII.A.2 Monitoring, Recordkeeping, Reporting and Compliance upon the issuance date of this permit.

5. NAC 445B.3405 (NAC 445B.316) Part 70 Program

Shielded Requirements

No specific shield requested.

*****End of Specific Operating Conditions*****



BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0012

Permit No. AP3441-2437

**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section VII. Emission Caps

A. Cap for Emission Units PF1.001 - PF1.004 and S2.001 - S2.002

1. Emission Limits

On and after the effective date of this operating permit, Valley Joist, Inc. will not discharge or cause the discharge into the atmosphere, the following pollutants in excess of the following specified limits:

- a. The combined total discharge of VOC from PF1.001, PF1.002, PF1.003, PF1.004, S2.001 and S2.002, and any other VOC containing material for truss manufacturing and coating/clean-up processes, to the atmosphere will not exceed **249.0 tons** per year, calculated on a 12-month rolling period.
- b. The combined total discharge of HAPs to the atmosphere will not exceed **9.9 tons** per calendar month on any single HAP.
- c. The combined discharge of HAPs to the atmosphere will not exceed **24.5 tons** per year, calculated on a 12-month rolling average.
- d. The emission limits in this paragraph apply at all times, including startups, shutdowns, and normal operations.

2. Monitoring, Recordkeeping, Reporting and Compliance

a. Permittee, upon issuance date of this permit will:

- (1) Monitor and record the VOC content in pound(s) VOC/gallon as provided by the vendor for each paint/coating.
- (2) The required monitoring and recordkeeping established in A.2.a.(1) of this Section, will be maintained in a contemporaneous log containing, at minimum, the following:
 - (a) The calendar date of any required monitoring.
 - (b) The initial gallons of paint/coating material, solvent and any other VOC containing material contained in PF1.001, PF1.002, PF1.003, PF1.004, S2.001 and S2.002 each and utilized for truss manufacturing and coating/clean-up processes recorded on a monthly basis.
 - (c) The total gallons usage rate of each paint/coating material, solvent and any other VOC containing material in PF1.001, PF1.002, PF1.003, PF1.004, S2.001 and S2.002 each and utilized for truss manufacturing and coating/clean-up processes recorded on a monthly basis. Copies of all purchase orders and invoices used to determine paint/coating material, solvent and any other VOC containing material monthly usage rate must be maintained with the corresponding month's records.
 - (d) The total VOC content in pound(s) VOC/gallon, of each paint/coating material, solvent and any other VOC containing material for the corresponding material usage as identified in A.2.a.(2)(b) and (c) above.
 - (e) The combined total quantity of VOC emitted in ton(s) from all paint/coating material, solvent and any other VOC containing material for the corresponding material usage as identified in A.2.a.(2)(b), (c) and (d) above.
 - (f) The combined total quantity of VOC emitted, at the end of each calendar month as determined from each monthly record. The resultant monthly totals will be added on a rolling monthly basis and compared against the annual emission limitation established in Section VII.A.1.a. of this permit.
 - (g) These records shall list all paint/coating material and solvent and any other VOC containing material by manufacturer and product name.
- (3) Conduct and record a visible emissions reading on the exhaust points of PF1.001, PF1.002, PF1.003, PF1.004, S2.001 and S2.002 on an annual basis. Visible emissions readings will use the procedures contained in 40 CFR Part 60 Appendix A, Method 9. The visible emissions readings will not be performed back-to-back. There will be at least 6 months between readings. The visible emissions reading must be conducted by a certified visible emissions reader for a period of 6 minutes and must be made while the emission unit is operating and has the potential to create visible emissions. The Method 9 visible emission reading requirement can be waived for PF1.001, PF1.002, PF1.003, PF1.004, S2.001 and S2.002 providing the following conditions are met.
 - (a) A survey of the emission units must be made in accordance with the procedures contained in 40 CFR Part 60, Appendix A, Method 22. The survey will be conducted for a minimum of 6 minutes.



BUREAU OF AIR POLLUTION CONTROL

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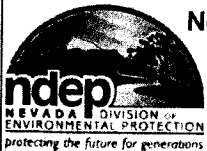
**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section VII. Emission Caps cont'd

- (b) If the survey detects visible emissions, excluding condensed water vapor, for more than 18 seconds of the survey time a Method 9 visible emission reading must be conducted by a certified visible emissions reader within 1 hour of the initial survey.
 - (c) The results of the survey including date and time, and any corrective action taken (including the result of any further Method 9 visible emission reading) will be recorded in a contemporaneous log.
- b. When operating under Part A of this Section, Valley Joist, Inc. must record in a contemporaneous log all monitoring and recordkeeping information required under 2.a of this Section. In addition, a reference must be included in the contemporaneous log that identifies that all of the emission units specified in Part A of this Section are operating under the provisions of Section VII.A of this operating permit.

*******End of Emission Caps*******



Nevada Department of Conservation and Natural Resources • Division of Environmental Protection

BUREAU OF AIR POLLUTION CONTROL

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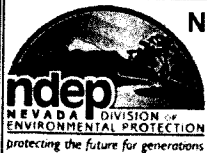
**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section VIII. Surface Area Disturbance Conditions

No specific conditions required.

*****End of Surface Area Disturbance Conditions*****



Nevada Department of Conservation and Natural Resources • Division of Environmental Protection

BUREAU OF AIR POLLUTION CONTROL

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**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section IX. Schedules of Compliance

No compliance schedules required.

*****End of Schedules of Compliance*****



BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0012

Permit No. AP3441-2437

**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Valley Joist, Inc., as Permittee

Section X. Amendments

This permit:

1. Is non-transferable. (NAC 445B.287) Part 70 Program
2. Will be posted conspicuously at or near the stationary source. (NAC 445B.318) (State Only Requirement)
3. Will expire and be subject to renewal five (5) years from DRAFT.
(NAC 445B.315) Part 70 Program
4. A complete application for renewal of an operating permit must be submitted to the director on the form provided by him with the appropriate fee at least 240 calendar days before the expiration date of this operating permit. (NAC 445B.323.2) Part 70 Program
5. Any party aggrieved by the Department's decision to issue this permit may appeal to the State Environmental Commission (SEC) within ten days after the date of notice of the Department's action. (NRS 445B.340) (State Only Requirement)

THIS PERMIT EXPIRES ON: DRAFT

Signature DRAFT

Issued by: Matthew A. DeBurle, P.E.
Supervisor, Class I Permitting Branch
Bureau of Air Pollution Control

09/08 in

Phone: (775) 687-9391

Date: October 13, 2008



BUREAU OF AIR POLLUTION CONTROL

CLASS I NON-PERMIT EQUIPMENT LIST

Appended to Valley Joist, Inc. Facility #A0519 Permit #AP3271-2457

Emission Unit #	Emission Unit Description
IA1.001	250 Gallon Horizontal Diesel Storage Tank; (NAC 445B.288.2(a))
IA1.002-1.017	16 Natural Gas Heaters, heat input 0.090 MMBtu each; (NAC 445B.288.2(e)(1))
IA1.018-1.020	3 Natural Gas Heaters, heat input 0.095 MMBtu each; (NAC 445B.288.2(e)(1))
IA1.021-1.022	2 Natural Gas Heaters, heat input 0.050 MMBtu each; (NAC 445B.288.2(e)(1))
IA1.023-1.026	4 Natural Gas Heaters, heat input 0.092 MMBtu each; (NAC 445B.288.2(e)(1))
IA1.027	1 Natural Gas Heater, heat input 0.040 MMBtu; (NAC 445B.288.2(e)(1))
IA1.028-1.029	2 Natural Gas Heaters, heat input 0.059 MMBtu each; (NAC 445B.288.2(e)(1))
IA1.030	Wood sawing, 1 portable electric saw; ~15,000 board feet per year; (NAC 445B.288.4(a))
IA1.031-1.033	3-152 HP and 1-114 HP Diesel Forklift; (NAC 445B.288.2(f)(1))
IA1.034	1-35 HP Propane Forklift; (NAC 445B.288.2(f)(1))

Note: The equipments listed on this attachment are subject to all applicable requirements of the NAC and ASIP.